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19           *Attorneys for Defendant Meta Platforms, Inc.*

20           **UNITED STATES DISTRICT COURT**

21           **NORTHERN DISTRICT OF CALIFORNIA**

22           **SAN FRANCISCO DIVISION**

23           MAXIMILIAN KLEIN, et al., on behalf of  
24           themselves and all others similarly situated,

25           Case No. 3:20-cv-08570-JD

26           Plaintiffs,

27           **[PROPOSED] ORDER TO AMEND THE  
28           DEPOSITION PROTOCOL**

1           v.

2           Judge: Hon. James Donato

3           META PLATFORMS, INC., a Delaware  
4           Corporation,

5           Defendant.

1  
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3  
4 **[PROPOSED ORDER]**

5 PURSUANT TO STIPULATION, IT IS SO ORDERED that:

6 1) The Parties are bilaterally bound to the following deposition limits. All limits that apply “per  
7 side” apply to Meta Platforms, Inc., on the one hand, and User and Advertiser Plaintiffs  
8 collectively, on the other:

9 a. Each side shall be limited to a total of two hundred and sixty (260) deposition hours of  
10 the current and former employees of Meta Platforms, Inc. and there shall be a maximum  
11 of 50 witnesses deposed under this category, per side. Each deposition shall count  
12 towards the 50-deposition limit and for a minimum of three (3) hours, even if the  
13 elapsed time on the record is less than three (3) hours.

14 b. For nonparties to this action, not including former employees of Meta Platforms, Inc.,  
15 the Parties shall be limited to a total of 105 deposition hours per side, with each  
16 deposition counting towards a minimum of (3) hours, even if the elapsed time on the  
17 record is less than three (3) hours.

18 2) Non-party depositions that are cross-noticed by Meta Platforms, Inc. and one or both of User  
19 and/or Advertiser Plaintiffs shall not exceed ten (10) hours total, with each side receiving up  
20 to five (5) hours of deposition time. If a lesser amount of time is negotiated for a given non-  
21 party, then the time allowed will be split equally (i.e., 50/50) between Meta Platforms, Inc., on  
22 the one hand, and one or both of Users and/or Advertisers, on the other. The Parties shall  
23 consult with cross-noticed deponents to split the deposition over a period of two (2) days, if  
24 necessary, by mutual agreement.

25 3) If one side does not notice a particular deposition, that side shall be permitted to question the  
26 deponent for up to one (1) hour at the end of primary questioning (i.e., before redirect or  
27 recross), which time shall not count towards any of the limits set forth in this stipulation.

1       4) The Parties reserve their rights to seek reasonable modifications of these terms as appropriate  
2                    in individual instances and in good faith.

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4       DATED: February 15, 2023



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7       JAMES DONATO  
8                    United States District Judge

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10      Submitted by:

11      By: /s/ Shana E. Scarlett

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